

**REPLY DECLARATION
OF
JAMES M. BRADBURY
ATTACHMENT 25**

October 23, 2001

Ms. Lisa Harvey
Division Regulatory Oversight
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 235D
Tallahassee, FL 32399-0865

Dear Ms. Harvey:

This letter is in response to the Florida Public Service Commission's Staff request for KPMG Consulting to provide a recommendation regarding the inclusion of BellSouth's new UNE billing solution in the Third-Party OSS Test. The remainder of this letter details the Background, Issue, Analysis, Reporting Options, Evaluation and Recommendation.

Background

The Florida Master Test Plan (MTP) directed the evaluation of BellSouth's billing systems, including bill accuracy (validation), usage accuracy, and adequacy of billing processes. KPMG Consulting has been engaged in billing testing since the fall of 2000. Several areas of billing analysis have been completed since that time. Some tests, most notably the usage billing tests, have significant issues which are in the process of resolution. During the week of October 1, 2001, BellSouth confirmed that new UNE billing elements will be rolled out in Florida on December 14, 2001. The Florida OSS Evaluation is currently scheduled to end on December 16, 2001.

Issue

Should the new UNE billing changes be tested and if so, should the test results be included in the OSS Evaluation Final Report?

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Analysis

Based on information provided by BellSouth, KPMG Consulting believes that elements of bill validation, usage, and process tests associated with changes in the UNE billing systems require additional testing. KPMG Consulting also believes this testing to be within the scope of the OSS Evaluation activities directed by the MTP. If testing were to occur, it would begin in November 2001, and if no substantial issues arise, finish in March 2002.

Reporting Options

There are two primary options for reporting the results of the UNE tests recommended above:

- A) Include the additional UNE billing test results as part of the Florida OSS Evaluation Final Report.
- B) Separate the additional UNE billing tests from the Florida OSS Evaluation Final Report. The Final Report would include all other OSS Evaluation results, except those for the changed UNE billing elements. A separate report would be presented upon completion of the additional UNE billing testing.

Evaluation

Option A – Include the additional UNE billing test results as part of the Florida OSS Evaluation Final Report

Benefits:

- a. Florida OSS Evaluation Final Report is an all-inclusive document.
- b. Any problems discovered in the additional UNE bill testing related to other test areas can be addressed within the 271 process.

Risks:

- a. As the test lengthens, all test results begin to age. As the test results age, KPMG Consulting's confidence that the results represent current operations decreases.
- b. The UNE billing modifications may not be implemented on schedule, or significant issues may be discovered, lengthening the entire test past Spring 2002.

Option B – Separate the additional UNE billing test reporting from the Florida OSS Evaluation Final Report

Benefits:

- a. Ensures that majority of the test results do not age significantly.

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- b. Keeps issues with the additional UNE billing tests from drawing out the other parts of the OSS Evaluation process.

Risks:

- a. The Florida OSS Evaluation Final Report is not all-inclusive.
- b. The Florida OSS Evaluation Final Report presents an incomplete record on billing.
- c. Issues discovered in non-UNE areas during the additional UNE billing tests cannot be addressed in the normal OSS Evaluation process.

Recommendation

KPMG Consulting recommends that the Florida Public Service Commission pursue testing of the new UNE billing elements. In KPMG Consulting's opinion, the risk of other test elements aging outweighs other considerations. Therefore it is KPMG Consulting's recommendation that the new UNE billing testing results be separated from the Florida OSS Evaluation Final Report..

Very truly yours,

KPMG Consulting

David B. Wirsching, III
Managing Director

cc: Mr. Walter D'Haeseleer, Florida Public Service Commission
Mr. Milton McElroy, BellSouth Telecommunications, Inc.
Mr. Marshall Criser, BellSouth Telecommunications, Inc.
Ms. Maryrose Sirianni, BellSouth Telecommunications, Inc.
Ms. Kathy Wilson-Chu, BellSouth Telecommunications, Inc.

OBSERVATION 124

BellSouth Florida OSS Testing Evaluation

Date: October 12, 2001

OBSERVATION REPORT

An observation has been identified as a result of test activities associated with the Documentation Review of the Change Management Process (PPR-1).

Observation:

BellSouth failed to follow the documentation defect procedures as detailed in the BellSouth Change Control Process document¹. (PPR1)

Background:

During the test CLEC investigation of the TAG interface upgrade from TAG 7.5.0.15 to TAG 7.6.2.1, KPMG Consulting discovered that the following fields or method calls were contained in the TAG 7.6.2.1 API available at,
http://www.interconnection.bellsouth.com/oss/tag/tag_info.html:

File:	xstaOrder.h
Structure:	EULocationAndAccessHeader
New Field:	xstaString ncon; // New Location
New Method:	getPurchaseOrderDetailList
New Method:	displayLsr
File:	xstaLoop.h
Structure:	Fn
New Field:	xstaString snum; // Segment Number
New Method:	reservationCableAndPair
New Method:	CABSCustomerServiceRecordReq

However, when accessed on October 2, 2001, the TAG API Reference Guide for TAG Release 7.6.2.1 did not contain an explanation of the applicability or use of these fields and methods. When the BellSouth website was again accessed on October 3, 2001 at 6:30PM EST, the missing information had been added to Appendix J of the TAG API Reference Guide for TAG Release 7.6.2.1.

¹ Version 2.6